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TO: DOCKET MANAGEMENT SYSTEM
US DEPARTMENT OF TRANSPORTATION
ROOM PLAZA 401
400 SEVENTH STREET
WASHINGTON, DC 20590-0001

FROM: A. SABROUX

VENICE, CA. 90291

RE: **FAA Docket Number FAA-2003-16526** - 23
Stage IV Aircraft Noise Standards

As a resident who lives in close proximity to a general aviation airport, I am angered by the FAA proposed Stage IV Standards. This proposal has several very blatant flaws in it:

- These New Standards will not apply to aircraft under 75,000lbs. Although our local airport is considered "non-commercial," it has seen a shocking increase of business jet traffic. The Noise and Emissions of these "sub" 75,000lbs aircraft have an immense impact on our community. Our General Aviation Airport and many others across the country no longer just serve recreational prop aircraft but a growing fleet of business aviation aircraft that continue to be unregulated.
- Proposed Stage IV Standards do not include a phase out of older aircraft. I know that European representatives to the International Civil Aviation Organization (ICAO) Conference where these proposed standards were formulated pushed for older aircraft (Stage III) phase out, but the United States lobbied and won for no phase out. All other upgraded standards in the past always included a phase out of previous stage aircraft.
- European representatives to ICAO also wanted a stricter 14 decibel noise reduction in newer aircraft. Again, the U.S. lobbied for a lesser 10db reduction that most currently manufactured aircraft can already meet.

Posting and soliciting public comment on these proposed Standards is a farce. These Standards have already been set and agreed upon in international treaty by the members of ICAO including the United States. In other words, there is no intention of making any changes no matter what the tone of the public comment you receive.

Public Comment should be solicited BEFORE the FAA goes to ICAO to represent what they think is in the best interest of the United States. When ICAO meets to set future Stage V Standards, the US delegation must really represent the needs of its citizens including collecting public comment PRIOR to the Conference, stricter Noise Standards for ALL aircraft including those under 75,000lbs, and a phase out of noisier older Aircraft.

- . 10 db noise reduction from the Stage III standard was agreed upon for Stage IV Aircraft. Ironically, aircraft currently being manufactured can already meet this reduction. The Europeans pushed for a 14db reduction, but the US lobbied for only 10db and won.
- . No phase out of Stage III Aircraft was included. In the past, when a new Stage Aircraft was set, a phase out of older aircraft was put into place.

. NONE OF THE NEW STANDARDS ARE ENFORCED FOR AIRCRAFT UNDER 75,000lbs. In other words, almost all general aviation aircraft including most non-commercial jets (i.e. private business jets) will not have to comply with the new standards. Santa Monica (California) Airport has a weight limit of 60,000lbs. NONE OF THE AIRCRAFT USING THE SM AIRPORT WILL BE REQUIRED TO COMPLY TO ANY NEW STANDARDS!

. FAA didn't have ANY public process (and presumably isn't required to) when formulating the policy they pushed at the ICAO meeting that set these standards. Then they aggressively lobbied other countries to vote for their proposed standards instead of the stricter European standards.

Sincerely,
A. Sabroux